

1 **OUTTEN & GOLDEN LLP**
2 Moira Heiges-Goepfert (Cal. Bar No. 326861)
3 One California Street, 12th Floor
4 San Francisco, CA 94111
5 New York, NY 10017
6 Telephone: (212) 245-1000
7 Facsimile: (415) 638-8810
8 mhg@outtengolden.com

9 **McGUIREWOODS LLP**
10 Jamie D. Wells (SBN 290827)
11 Two Embarcadero Center
12 Suite 1300
13 San Francisco, CA 94111-3821
14 Telephone: 415.844.9944
15 Facsimile: 415.844.9922

16 **LAWYERS FOR CIVIL RIGHTS**
17 Ivan Espinoza-Madrigal**
18 Oren Nimni**
19 61 Batterymarch Street, 5th Floor
20 Boston, MA 02110
21 Telephone: (617) 482-1145
22 Facsimile: (617) 482-4392
23 iespinoza@lawyersforcivilrights.org
24 onimni@lawyersforcivilrights.org

25 K. Issac deVyver (*pro hac vice*)
26 Karla Johnson (*pro hac vice*)
27 Tower Two-Sixty
28 260 Forbes Avenue
Suite 1800
Pittsburgh, PA 15222
Telephone: 412.667.6000
Facsimile: 412.667.6050

29 ***Pro hac vice* application forthcoming

30 *Attorneys for Defendants*
31 *Social Finance, Inc. d/b/a SoFi and*
32 *SoFi Lending Corp. d/b/a SoFi*

33 *Attorneys for Plaintiff Ruben Juarez and the*
34 *Proposed Class*
35 *(Additional Counsel Listed on Signature Page)*

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37 **UNITED STATES DISTRICT COURT**
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39 **NORTHERN DISTRICT OF CALIFORNIA**

40 RUBEN JUAREZ, individually and on behalf
41 of all others similarly situated,

42 CASE NO: 4:20-cv-03386-HSG

43 Plaintiff,

44
45 **JOINT STIPULATION AND [PROPOSED]**
46 **ORDER TO SET BRIEFING SCHEDULE**
47 **IN RESPONSE TO DEFENDANTS'**
48 **MOTION TO STAY DISCOVERY**

49 vs.
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51 SOCIAL FINANCE, INC. d/b/a SOFI, and
52 SOFI LENDING CORP. d/b/a SOFI,
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54 Defendants.

55 Complaint Filed: May 19, 2020

56 District Judge Haywood S. Gilliam, Jr.

1 Pursuant to civil Local Rules 6-1(b) and 6-2, Plaintiff Ruben Juarez (“Plaintiff”), through
 2 counsel, along with counsel for Defendants Social Finance, Inc. d/b/a SoFi and SoFi Lending
 3 Corp. d/b/a SoFi (collectively, “SoFi”), respectfully submit the following Joint Stipulation and
 4 Proposed Order to Set Briefing Schedule in Response to SoFi’s Motion to Stay Discovery, ECF
 5 No. 29.

6 **RECITALS**

7 WHEREAS, on May 19, 2020, Plaintiff filed a putative class action Complaint against
 8 SoFi in the above-captioned matter (D.E. 1);

9 WHEREAS, on June 5, 2020, pursuant to Local Rule 6-1(a), Plaintiff and SoFi (together,
 10 the “Parties”) filed a Joint Stipulation to Extend Time to Respond to Initial Complaint, extending
 11 the time for SoFi to respond to the Complaint for a period of approximately twenty-one days, up
 12 to and including July 9, 2020 (D.E. 14);

13 WHEREAS, counsel for Plaintiff requested a modified briefing schedule in the event that
 14 SoFi filed a responsive Motion, and following meet and confer between counsel for Plaintiff and
 15 counsel for SoFi, the Parties agreed to modify the briefing schedule as follows, as set forth in the
 16 Joint Stipulation filed at ECF No. 24:

- 17 • Plaintiff’s Opposition to Defendants’ Motion in response to Plaintiff’s Complaint
 shall be due 21 days following the filing of Defendants’ Motion, and therefore shall
 be filed on or before July 30, 2020;
- 18 • SoFi’s Reply shall be due 14 days following the filing of Plaintiff’s Opposition,
 and therefore shall be filed on or before August 13, 2020;

22 WHEREAS, on July 7, 2020, the Court approved that Joint Stipulation, ECF No. 26;

23 WHEREAS, on July 9, 2020, SoFi filed a responsive Motion with a Motion Hearing set for
 24 August 27, 2020, ECF No. 28;

25 WHEREAS, on July 9, 2020, SoFi also filed a Motion to Stay Discovery with a Motion
 26 Hearing set for August 27, 2020, ECF No. 29;

27 WHEREAS, the Parties have met and conferred and now agree that the same briefing
 28 schedule that applies to SoFi’s responsive Motion should also apply to SoFi’s Motion to Stay

1 Discovery to provide the Parties time to evaluate and analyze the arguments and prepare a
2 response;

3 WHEREAS, the Parties state that this request is not the result of dilatory conduct;

4 WHEREAS, the parties state that both Motions are set for the same Motion Hearing date;

5 WHEREAS, this Court has set the Initial Case Management Conference for August 25,
6 2020 at 2:00 PM with the Case Management Statement due on August 18, 2020 (ECF 20) and,
7 accordingly, this extension of time will not alter the date or any event or deadline already fixed by
8 Court order;

9 WHEREAS, the Parties affirm that no party will be prejudiced by the short extension, nor
10 will the requested extension unduly delay the case;

11 WHEREAS, the Parties previously filed a Joint Stipulation to Extend Time to Respond to
12 Initial Complaint (ECF No. 14) and a Joint Stipulation to Set Briefing Schedule in Response to
13 Plaintiff's Complaint (ECF No. 24).

14 **STIPULATION**

15 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff
16 and SoFi through their respective undersigned counsel that:

- 17 1. Plaintiff's Opposition to SoFi's Motion to Stay Discovery shall be filed on or
18 before July 30, 2020;
- 19 2. SoFi's Reply shall be filed on or before August 13, 2020;
- 20 3. The only prior extensions of time in this action were a 21-day extension of time for
21 SoFi to respond to the Complaint and a 7-day extension of the standard briefing
22 schedule for Plaintiff's Opposition to SoFi's Responsive Motion and SoFi's Reply;
- 23 4. This extension will not affect any other deadlines set by the Court in this case;
- 24 5. This stipulation is without prejudice to the rights, claims, arguments, and defenses
25 of all parties; and
- 26 6. All other signatories listed, and on whose behalf the filing is submitted, concur with
27 the content in this Stipulation and have authorized the filing.

1 IT IS SO STIPULATED.

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3 DATED: July 10, 2020

McGUIREWOODS LLP

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By: /s/ K. Issac deVyver

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K. Issac deVyver (*pro hac vice*)
Karla Johnson (*pro hac vice*)
Tower Two-Sixty
260 Forbes Avenue
Suite 1800
Pittsburgh, PA 15222
Telephone: 412.667.6000
Facsimile: 412.667.6050

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Jamie D. Wells (SBN 290827)
Two Embarcadero Center
Suite 1300
San Francisco, CA 94111-3821
Telephone: 415.844.9944
Facsimile: 415.844.9922

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SoFi Lending Corp. d/b/a SoFi

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DATED: July 10, 2020

OUTTEN & GOLDEN LLP

By: /s/ Michael Litrownik

Michael Litrownik*
Ossai Miazad*
685 Third Avenue, 25th Floor
New York, NY 10017
Telephone: (212) 245-1000
Facsimile: (646) 509-2060
mlitrownik@outtengolden.com
om@outtengolden.com

1 Moira Heiges-Goepfert (Cal. Bar No. 326861)
2 OUTTEN & GOLDEN LLP
3 One California Street, 12th Floor
4 San Francisco, CA 94111
5 New York, NY 10017
6 Telephone: (212) 245-1000
7 Facsimile: (415) 638-8810
8 mhg@outtengolden.com

9
10 Mikael Rojas (Cal. Bar No. 309626)
11 OUTTEN & GOLDEN LLP
12 601 Massachusetts Avenue NW, Suite 200W
13 Washington, D.C. 20001
14 Telephone: (202) 847-4400
15 Facsimile (646) 509-2008
16 mrojas@outtengolden.com

17 Ivan Espinoza-Madrigal**
18 Oren Nimni**
19 LAWYERS FOR CIVIL RIGHTS
20 61 Batterymarch Street, 5th Floor
21 Boston, MA 02110
22 Telephone: (617) 482-1145
23 Facsimile: (617) 482-4392
24 iespinoza@lawyersforcivilrights.org
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1 Attorneys for Plaintiff Ruben Juarez and the
2 Proposed Class

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED,

DATED: 7/14/2020

Haywood S. Gill Jr.

Haywood S Gilliam, Jr
United States District Judge